

**UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION**

IN RE: )  
 )  
**PERFECT FIT INDUSTRIES, LLC** )      CASE NO. 20-30706  
 )      CHAPTER 7  
Debtor. )  
 )      **RESPONSE TO MOTION OF TRUSTEE TO**  
 )      **DETERMINE AMOUNTS OWED PURSUANT**  
 )      **TO ORDER GRANTING TRUSTEE'S MOTION**  
 )      **TO SELL ENTERED SEPTEMBER 3, 2020**  
 )  
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**COMES NOW** Regal West Corporation (hereinafter "Regal West"), by and through counsel, and responds to the Motion of the Trustee identified herein, said Motion being dated 22 March 2021. In response to the Motion of the Trustee, Regal West would request that the Court conduct a hearing to consider all available information and evidence. Undersigned counsel is in the process of reviewing documents attached to the Motion of the Trustee, along with various other documents and accountings as requested by the undersigned counsel. As a result, undersigned counsel has been unable to formulate a specific response as to the amount owed, if any, and therefore requests that the Court conduct a hearing to consider all evidence to determine the Motion of the Trustee.

This 9<sup>th</sup> day of April, 2021.

*/s/ R. Keith Johnson*

R. Keith Johnson,  
Attorney for Regal West Corporation  
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(704) 827-4200

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IN RE: )  
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PERFECT FIT INDUSTRIES, LLC ) CASE NO. 20-30706  
 ) CHAPTER 7  
Debtor. )  
 ) CERTIFICATE OF SERVICE  
\_\_\_\_\_  
)

**CERTIFICATE OF SERVICE**

**THIS IS TO CERTIFY** that on the below date, the undersigned served a copy of the RESPONSE TO MOTION OF TRUSTEE TO DETERMINE AMOUNTS OWED PURSUANT TO ORDER GRANTING TRUSTEE'S MOTION TO SELL ENTERED SEPTEMBER 3, 2020 either electronically or by depositing, enclosed in a postpaid wrapper, properly addressed to the following parties in interest, at their last known addresses as shown below, in a post office or official depository under the exclusive care and custody of the United States Postal Service:

John W. Taylor (ECF)  
Attorney for Trustee  
(Also via e-mail: [johntaylor@johntaylorlaw.com](mailto:johntaylor@johntaylorlaw.com))

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Anna S. Gorman (ECF)  
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Attorney for Perfect Fit Industries, LLC

Joseph W. Grier, III (ECF)  
Grier Wright Martinez, PA  
Attorney for Perfect Fit Industries, LLC

Shelley Abel (ECF)  
Bankruptcy Administrator

This 9<sup>th</sup> day of April, 2021.

/s/ R. Keith Johnson

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